

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

BERIN LOCKWOOD, Individually
and on behalf of Class Members,

Plaintiff,

V.

FULL SPECTRUM LENDING, INC.
and COUNTRYWIDE HOME
LOANS, INC.,

Defendants.

Civil Action No. 05-10647 (MLW)

**JOINT MOTION FOR
CONTINUANCE OF
FEBRUARY 8, 2006 HEARING**

Pursuant to Local Rule 7.1(B)(3), plaintiff Berin Lockwood (“Plaintiff”) and defendants Full Spectrum Lending, Inc. (n/k/a Full Spectrum Lending, a division of Countrywide Home Loans, Inc.) and Countrywide Home Loans, Inc. (collectively “Defendants”), hereby jointly request that this Court continue the hearing on Defendants’ Motion to Compel Arbitration, Dismiss or Stay Litigation, and Dismiss Class Allegations (April 22, 2006) (“Motion”) currently scheduled for February 8, 2006 at 3:00 p.m. to a date and time convenient for the Court on March 6, 7, 8 or 9, 2006. As grounds for this Motion, the parties state that they are engaged in active settlement discussions that may obviate the need for hearing and resolution of the Motion. The requested one month continuance of the hearing should allow the parties sufficient time to effect a settlement, if one is possible. In addition, it will conserve the parties’ and this Court’s resources pending the outcome of the parties’ settlement discussions.

WHEREFORE, for all the foregoing reasons, Plaintiff and Defendants respectfully request that this Court continue the February 8, 2006 hearing on the Motion to date and time convenient to the Court on March 6, 7, 8, or 9, 2006.

FULL SPECTRUM LENDING, INC.
(n/k/a Full Spectrum Lending, a division of
Countrywide Home Loans, Inc.) and
COUNTRYWIDE HOME LOANS, INC.

By their attorneys,

/s/ Brooks R. Brown

Brooks R. Brown (BBO # 634144)
GOODWIN PROCTER LLP
Exchange Place
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(617) 570-1000

-and-

BERIN LOCKWOOD

By his attorney,

/s/ Evans J. Carter / BRB

Evans J. Carter (BBO # 076560)
LAW OFFICES OF EVANS J. CARTER, P.C.
860 Worcester Road
Framingham, MA 01702
(508) 875-1669

LOCAL RULE 7.1(A)(2) CERTIFICATE AND CERTIFICATE OF SERVICE

I certify pursuant to Local Rule 7.1(A)(2) that the moving party has conferred in good faith with opposing counsel on the matter set forth herein and that opposing counsel joins in the relief sought herein.

I further certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 7, 2006.

/s/ Brooks R. Brown